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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SKYWEST PILOTS ALPA ORGANIZING )  
COMMITTEE, *et al.*, )  
Plaintiffs, )  
vs. )  
SKYWEST AIRLINES, INC., )  
Defendant. )

CASE No. C-07-2688 CRB

**DECLARATION OF CLAIRE  
PRESTEL IN OPPOSITION TO  
DEFENDANT'S MOTION TO  
TRANSFER VENUE**

1 I, Claire Prestel, declare as follows:

2 1. I am a member of the bar of this Court and an attorney for plaintiffs in this case. I  
3 make this declaration based on my own personal knowledge, except as specifically stated herein. If  
4 called upon to testify as to the matters within my personal knowledge, I could and would testify  
5 competently thereto.

6 2. Plaintiffs' complaint names nine individual pilot Plaintiffs. Four of the nine reside in  
7 California – more than in any other single state: (1) Plaintiff Frank Bowlin lives in this judicial  
8 district, in Aptos, California; (2) Plaintiff David Boehm lives in Placentia, California; (3) Plaintiff  
9 Diletta Martirano lives in Del Mar, California; and (4) Plaintiff Andy Bharath lives in Newport  
10 Beach, California. Only one of the nine individual pilot Plaintiffs lives in Utah: (5) Plaintiff Tracy  
11 Shrier. I am informed and believe that the remaining four Plaintiffs are scattered in various  
12 states: (6) Plaintiff Steve Dow lives in Monument, Colorado; (7) Plaintiff Riad Mansur lives in  
13 Chicago, Illinois; (8) Plaintiff Charles “Phil” Alford lives in Rexburg, Idaho; and (9) Plaintiff Marc  
14 Johnson lives in Chicago, Illinois.

15 3. In a letter sent to Defendant's counsel on May 25, 2007, Plaintiffs identified seven  
16 witnesses they intend to call during the preliminary injunction evidentiary hearing, including five  
17 pilot Plaintiffs. A true and correct copy of Plaintiffs' May 25, 2007 letter is attached hereto as  
18 Exhibit A.

19 4. Two of Plaintiffs' witnesses reside in California – more than in any other single state:  
20 (1) Andy Bharath lives in Newport Beach, California; (2) David Boehm lives in Placentia,  
21 California. Plaintiffs' other witnesses are scattered in various states: (3) Steve Dow lives in  
22 Monument, Colorado; (4) Tracy Shrier lives in Salt Lake City, Utah; (5) Phil Alford lives in  
23 Rexburg, Idaho; (6) Steve Kanuch lives in Belgrade, Montana; and (7) Jeff MacDonald lives in  
24 Maryland.

25 5. Although Defendant contends that Steve Kanuch resides in Utah, Defendant does not  
26 cite any evidence to support this claim, and I am informed and believe that Captain Kanuch resides  
27 in Belgrade, Montana. On Thursday, May 31, 2007, I also conducted an online White Pages search  
28 for Captain Kanuch and found his address listed in Belgrade, Montana. A true and correct copy of

1 the online White Pages entry for Captain Kanuch is attached hereto as Exhibit B.

2 6. SkyWest identifies on its website 16 crew domicile cities, including 9 in California –  
3 far more than in any other single state. The crew domicile cities are: Chicago, Colorado Springs,  
4 Denver, Fresno, Los Angeles, Palm Springs, Salt Lake City, San Diego, San Francisco, Tucson,  
5 Milwaukee, and Kansas City. Attached as Exhibit C are true and correct copies of print-outs from  
6 SkyWest's web site, including fact sheets listing crew domiciles and a current route map.

7 7. SkyWest's web site identifies 8 airline hubs, including 2 in California – more than in  
8 any other single state. SkyWest's hubs are: Chicago O'Hare, Los Angeles, San Francisco, Portland,  
9 Denver, Salt Lake City, Milwaukee, and Kansas City. *See* Ex. C ("current fact sheet").

10 8. SkyWest's web site states that the airline flies 114 daily departures from SFO. *See*  
11 Ex. C ("current fact sheet"). SkyWest also states that it flies 142 daily departures from LAX, for a  
12 total of at least 256 daily departures from California airports (though the true figure is likely to be  
13 much higher, because SkyWest also flies from Oakland, San Jose, Monterey, Fresno, *etc.*, *see* Ex. C  
14 ("current route system")).

15 9. By comparison, SkyWest's Current Route System shows that the airline flies from  
16 two cities in Utah – Salt Lake and St. George. SkyWest states that it flies 218 daily departures from  
17 Salt Lake City. *See* Ex. C ("current fact sheet"). On Thursday, May 31, 2007, I visited the web site  
18 of the St. George, Utah airport. The website shows 10 daily departures. Thus, the total daily  
19 departures from Utah are 228 (218 from Salt Lake and 10 from St. George) – fewer than from  
20 California on a daily basis. A true and correct copy of the print-out from the St. George Airport is  
21 attached hereto as Exhibit D.

22 10. SkyWest identifies 12 maintenance bases on its web site, including 5 in California –  
23 more than in any other state. The maintenance base cities are: Chicago, Colorado Springs, Denver,  
24 Fresno, Los Angeles, Palm Springs, Salt Lake City, San Diego, San Francisco, Tucson, Milwaukee,  
25 and Kansas City. *See* Ex. C ("current fact sheet").

26 11. SkyWest's current route map shows that the airline flies into or out of 26 California  
27 airports – more than any other state. The California airports include: Crescent City, Eureka/Arcata,  
28 Redding, Chico, Sacramento, Oakland, San Francisco, San Jose, Modesto, Monterey, Fresno, San

1 Luis Obispo, Santa Maria, Santa Barbara, Oxnard, Los Angeles, Long Beach, Carlsbad, San Diego,  
2 Imperial/El Centro, Orange County, Palm Springs, Ontario, Burbank, Bakersfield, Inyokern. *See*  
3 Ex. C (“current route system”).

4 12. I am informed and believe that ALPA maintains a field office in San Francisco. On  
5 Thursday, May 31, 2007, I visited ALPA’s web site and printed information about the various pilot  
6 groups ALPA represents. A true and correct copy of the print-outs of this information is attached  
7 hereto as Exhibit E.

8 13. The material attached as Exhibit E shows that ALPA represents more than 24,000  
9 employees who work for airlines or companies with hubs, bases, or “gateway” cities in California,  
10 including nearly 14,000 who work for airlines or companies with hubs, bases, or gateway cities in  
11 this judicial district.

12 14. SkyWest’s website shows that the company is headquartered in St. George, Utah, not  
13 in Salt Lake City. *See* Ex. C. Attached as Exhibit F are print-outs from an Internet mapping site  
14 that show the travel distance from St. George, Utah to Salt Lake City, Utah, and from Dammeron  
15 Valley, Utah to Salt Lake City, Utah. The trip from St. George to Salt Lake is listed as 303.1 miles.  
16 The trip from Dammeron Valley to Salt Lake is listed as 316.8 miles.

17 15. Attached as Exhibit G is a true and correct copy of a letter sent May 30, 2007 from  
18 Plaintiffs’ counsel to counsel for SkyWest. The letter reflects that several of Plaintiffs’ pilot  
19 witnesses were released by SkyWest to prepare for and participate in the originally scheduled June  
20 1, 2007 evidentiary hearing.

21 16. Attached as Exhibit H is a true and correct copy of a letter sent May 30, 2007 from  
22 SkyWest’s counsel to Plaintiffs’ counsel. The letter reflects SkyWest’s view that the company need  
23 not release pilot witnesses for preparation.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed on May  
25 31, 2007 at San Francisco, California.

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CLAIRE PRESTEL